

## **REMARKS**

Claims 1 through 22 are in the application, with Claims 9-18 and 21-22 having been withdrawn from further consideration. Claims 1-8, 19, and 20 are currently under consideration, with Claims 4 and 7 having been cancelled. Claims 1 and 19 are the independent claims herein. No new matter has been added. Reconsideration and further examination are respectfully requested.

### Drawing Objection

The drawings were objected to for allegedly failing to show every feature specified in the claims. Specifically, the Office Action alleges that the "third electrical contact of the integrated circuit substrate" and the "fourth electrical contact of the integrated circuit die" recited in Claim 8 are not shown in the drawings.

The objection is respectfully traversed. Applicants submit that FIG. 3 clearly illustrates an embodiment including all of the features of Claim 8. In particular, device 30 of FIG. 3 illustrates a pliant conductive element (15), where a first end of the pliant conductive element is electrically coupled to a first electrical contact (55) of an integrated circuit substrate (50) and a second end of the pliant conductive element is electrically coupled to a second electrical contact (45) of an integrated circuit die (40). FIG. 3 also illustrates a second pliant conductive element (15), where a first end of the second pliant conductive element is electrically coupled to a third electrical contact (55) of the integrated circuit substrate (50) and a second end of the second pliant conductive element is electrically coupled to a fourth electrical contact (45) of the integrated circuit die (40). Withdrawal of the objection to the drawings is respectfully requested.

### Claim Rejections – 35 U.S.C. §112, 2<sup>nd</sup> Paragraph

Claims 4 and 7 are rejected under the second paragraph of 35 U.S.C. §112 for alleged indefiniteness. Claims 4 and 7 have been cancelled, thereby rendering the rejection moot. Withdrawal of the rejection is respectfully requested.

Claim Rejections – 35 U.S.C. §102(b)

Claims 1-8 and 19-20 were rejected as allegedly being anticipated by U.S. Patent No. 5,454,161 (“Beilin”). Reconsideration and withdrawal of the rejection are respectfully requested.

Independent Claim 1 relates to an apparatus including a plurality of pliant conductive elements. A first end of one of the plurality of pliant conductive elements is to be electrically coupled to a first electrical contact of an integrated circuit substrate and a second end of the one of the plurality of pliant conductive elements is to be electrically coupled to a second electrical contact of an integrated circuit die.

FIG. 1 illustrates apparatus 10 according to some embodiments of Claim 1. Apparatus 10 includes pliant conductive elements 15. As described at page 3, lines 6-7 of the present specification, apparatus 10 may be used to provide electrical interconnection and absorb mechanical stresses between an IC die and an IC substrate.

Beilin is not seen to disclose or to suggest the foregoing features of Claim 1. Primarily, nowhere is Beilin seen to describe pliant conductive elements. Vias 24 of Beilin are described only as being electrically conductive, while interconnector 22 is described at col. 7, lines 5-6 as “high-density”. Moreover, the Office Action cites no portion of Beilin that provides any disclosure or suggestion of pliant conductive elements.

Independent Claim 1 is therefore believed to be in condition for allowance. Independent Claim 19 relates to a device including the aforementioned features of Claim 1 and is therefore also believed to be in condition for allowance for at least the foregoing reasons. Accordingly, remaining dependent claims 2, 3, 5, 6, 8 and 20 are also believed to be allowable.

## CONCLUSION

The outstanding Office Action presents a number of characterizations regarding the applied reference, some of which are not directly addressed herein because they are not related to the rejections of the independent claims. Applicants do not necessarily agree with the characterizations and reserve the right to further discuss those characterizations.

For at least the reasons given above, it is submitted that the entire application is in condition for allowance and such action is respectfully requested at the Examiner's earliest convenience. Alternatively, if there remains any question regarding the present application or any of the cited references, or if the Examiner has any further suggestions for expediting allowance of the present application, the Examiner is cordially requested to contact the undersigned via telephone at (203) 972-0049.

Respectfully submitted,

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Date



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